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8 **UNITED STATES DISTRICT COURT**  
 9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TRAFFICSCHOOL.COM, INC., a  
 California Corporation; DRIVERS ED  
 11 DIRECT, LLC, a California limited  
 liability company,

12 Plaintiffs,

13 v.

14 EDRIVER, INC., ONLINE GURU,  
 15 INC., FIND MY SPECIALIST, INC.,  
 and SERIOUSNET, INC., California  
 16 corporations, RAVI K. LAHOTI, an  
 individual; RAJ LAHOTI, an individual;  
 17 DOES 1 through 10,

18 Defendants.

Case No: CV 06-7561 PA (CWx)

**DEFENDANTS' REPLY TO  
 PLAINTIFFS' EVIDENTIARY  
 OBJECTIONS AND MOTION TO  
 STRIKE SUPPLEMENTAL  
 DECLARATION OF ANDREW  
 SERWIN IN SUPPORT OF  
 DEFENDANTS' OPPOSITION**

Date: December 5, 2011

Time: 1:30 p.m.

Ctrm: 15

Judge: Honorable Percy Anderson

Complaint Filed: November 28, 2006

19 Defendants Edriver, Inc., Online Guru, Inc., Find My Specialist, Inc.,  
 20 Seriousnet, Inc., Ravi K. Lahoti, and Raj Lahoti ("Defendants") hereby reply to  
 21 Plaintiffs' Evidentiary Objections And Motion To Strike Declaration Of Andrew  
 22 Serwin In Support Of Defendants' Opposition filed by plaintiffs  
 23 Trafficschool.com, Inc. and Drivers Ed Direct, LLC ("Plaintiffs") in support of  
 24 Plaintiffs' Motion for Attorney Fees and Costs as set forth below.

25 Plaintiffs' evidentiary objections are without merit as follows:

26 1. The evidence presented by Andrew Serwin's Declaration was soundly  
 27 presented for each statement and representation in Mr. Serwin's Declaration, for  
 28

1 the purpose of correcting and clarifying the evidentiary record.

2 2. Mr. Serwin's alleged statements during a "meet and confer" were the  
3 *subject of Mina Hamilton and Josephine Brosas' Declarations* submitted to  
4 support Plaintiffs' attorneys' fees application. Mr. Serwin, then, possesses  
5 adequate foundation and knowledge to clarify for the Court that he does not recall  
6 the discussion in the meet and confer process as was relayed to the Court by Mses.  
7 Hamilton and Brosas.

8 3. Documents submitted to the Court, including the various Joint  
9 Statements, speak for themselves.

10 Defendants respectfully request that the Court overrule Plaintiffs' unfounded  
11 objections and to the extent deemed necessary, consider the evidence presented by  
12 Defendants.

13 Dated: November 28, 2011

**FOLEY & LARDNER LLP**

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16  
17 By: /s/ Kathryn M.S. Catherwood  
18 KATHRYN M.S. CATHERWOOD  
19 Attorneys for Defendants  
20 EDRIVER, INC., ONLINE GURU  
21 INC., FIND MY SPECIALIST, INC.,  
22 SERIOUSNET, INC., RAVI K.  
23 LAHOTI, RAJ LAHOTI  
24  
25  
26  
27  
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**CERTIFICATE OF SERVICE**

I hereby certify on this 28th day of November, 2011 that a copy of the foregoing was filed electronically through the Court's CM/ECF system, with notice of case activity automatically generated and sent electronically to all parties.

FOLEY & LARDNER LLP

By: /s/ Kathryn M.S. Catherwood  
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